

**Exhibit A**

**Proposed Order**

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: Case No. 16-11700 (SMB)  
Gawker Media LLC, *et al.*,<sup>1</sup> :  
: (Jointly Administered)  
Debtors. :  
:-----X

**ORDER PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9006(c)  
SHORTENING NOTICE PERIOD AND SCHEDULING HEARING WITH RESPECT  
TO PLAN ADMINISTRATOR'S MOTION FOR ENTRY OF AN ORDER PURSUANT  
TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019 APPROVING RELEASE  
AGREEMENT WITH THIEL PARTIES**

Upon the motion (the “Motion to Shorten Time”)<sup>2</sup> of the Plan Administrator in the above-captioned cases (collectively, the “Debtors”) pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and 9006-1(b) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Bankruptcy Rules”), for entry of an order shortening the notice period and fixing the date and time for an expedited hearing on the *Plan Administrator's Motion for Entry of an Order*

<sup>1</sup> The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. “v.a.” (5056). The offices of the Debtors are located at 10 East 53rd Street, New York, NY 10022.

<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Motion to Shorten Time.

*Pursuant to Federal Rule of Bankruptcy Procedure 9019 Approving Release Agreement with Thiel Parties* (the “Motion to Approve Release Agreement”); and it appearing that the relief requested by this Motion to Shorten Time is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation and sufficient cause appearing therefor, it is hereby, **ORDERED, ADJUDGED AND DECREED that:**

1. The Motion to Shorten Time is granted to the extent set forth herein.
2. A hearing to consider the Motion to Approve Release Agreement will be held before the Honorable Stuart M. Bernstein in the United States Bankruptcy Court for the Southern District of New York, Courtroom 723, One Bowling Green, New York, NY 10004, on **May 1, 2018 at 10:00 a.m. (prevailing Eastern Time)**.
3. The objection deadline to respond or object to the relief requested in the Motion to Approve Release Agreement is **April 30, 2018 at 12:00 p.m. (prevailing Eastern Time)**.
4. The Plan Administrator, the Debtors, and their claims and noticing agent, Prime Clerk LLC, are authorized and empowered to take all actions necessary to implement the relief granted in this Order.
5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: [•], 2018  
New York, New York

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE